



December 10, 2009

Sustainable Communities Planning Grant and Incentives Program
c/o The Department of Conservation,
Office of Sustainability
801 K Street, MS 24-01
Sacramento, CA 95814

Sent via email: DOCSustainability@conservation.ca.gov

RE: Draft Guidelines and Application for Sustainable Communities Planning Grant and Incentives Program

Honorable Members of the Strategic Growth Council,

We applaud the efforts of the Council and its staff in creating the November 2009 draft guidelines for the Sustainable Communities Planning Grant and Incentives Program. As members of the public health community, we strongly support the Council's goal of incorporating public health and social equity considerations into the Sustainable Communities Planning Grant and Incentives Program application guidelines. We are deeply appreciative that these priorities are incorporated in the guidelines from the very inception of the program. Typically, when public health advocates and social justice coalitions provide comments, we are in the position of urging that these critically important, yet frequently overlooked, health and equity considerations be added to an already developed framework. In contrast, this process affords us the unfamiliar luxury of helping the Council and staff refine how health and equity priorities can be most effectively included and furthered. We commend these draft guidelines as

an excellent first step towards achieving a vision that will fund plans and programs that reduce greenhouse gas emissions and benefit public health while focusing resources to vulnerable populations in disadvantaged communities.

We offer the following suggestions as ways to strengthen and refine the application guidelines so that the limited grant funds can be strategically targeted to achieve a focused set of priorities – namely selecting plans and programs that will improve health and equity while achieving significant reductions in greenhouse gas emissions. Towards these goals, we recommend the following:

1. **Create a uniform and consistent set of funding priorities and evaluation criteria between all three Proposition 84 grants to reinforce the focused goals of achieving actual reductions in greenhouse gas emissions while making significant improvements in health and equity outcomes.** The existing language is very broad and does not provide sufficient targeted direction to applicants. Specifically, we recommend the following changes to the application criteria:
 - Develop a point system that clearly incentivizes the strategies and priorities that achieve the Council’s goals and make these required elements in the application. Providing a list of exemplar projects could be useful to illustrate the required priorities. Specifically, the evaluation criteria should require applicants to:
 - Achieve significant greenhouse gas reductions that are compliant with state climate goals of AB 32 and SB 375;
 - Create urban spaces that improve health outcomes, such as increasing opportunities for physical activity or improving air quality to reduce respiratory illness rates;
 - Allocate resources or provide services primarily to disadvantaged and severely disadvantaged communities;
 - Make green spaces safe and highly accessible to all community members, in particular to those populations that have experienced barriers to access;
 - Engage in meaningful community involvement in the planning and implementation of projects; and
 - Facilitate multi-agency cooperation, including coordination with public health departments, air districts, water boards, business interests, schools, and others.
 - Create a “mandatory requirements” section that sets forth the threshold elements an applicant MUST have. These elements would include, for example, demonstrating that a proposed plan or program is consistent with state planning priorities, complies with CEQA, labor laws, etc. An applicant would need to provide documentation and/or a written description to verify these foundational requirements. This initial evaluation would be a checklist – either the applicant meets these initial set of requirements and moves on to the ranking process or the application is considered incomplete.

- Place significant emphasis in the evaluation criteria on projects that will result in meaningful and actual change. For example:
 - If applying for a planning grant, then applicants must demonstrate what resources and ability they have to implement the plan in the future and what commitment they have to aligning city plans and ordinances (e.g. zoning) to ensure the plans be realized.
 - If applying for a program grant, applicants must demonstrate the ability to maintain and/or operate the program in the future.
- Convene a multi-disciplinary grant review team that consists of representatives with deep-expertise in the application priority areas. These would include environmental justice or social justice advocates, land use planners, public health professionals, and greenhouse gas reduction specialists. If possible, this team should include members of the public, academicians, local and regional government, and state agency staff.

2. Add specificity to the comprehensive description of a Health Community Appendix to enable applicants unfamiliar with public health strategies to better integrate tangible elements into their plans or programs. The current draft does an excellent job of providing an overview of the elements of a healthy community, however, we would like to see more detailed criteria added. Specifically, we recommend the following:¹

- Integrate health participation in the planning, development, and implementation of grant related activities. This would include requiring that public health needs and objectives be incorporated into all planning and decision-making processes and that representatives from the field of public and environmental health be engaged in all major planning and development decisions. This would include such things as:
 - Routine partnership with and involvement of public health and environmental health agencies in planning and project review;
 - Contribution and inclusion of relevant public health data, provided by public and environmental health agencies, to inform plan/project development; and
 - Use of health impact assessments (HIA) to evaluate large scale planning and project implementation that could have significant potential to affect health.
- Applicants should establish performance measures/indicators for healthy places. These metrics should be tracked before, during, and after plan/project implementation. Partnerships should be established and responsible agencies should be identified for data collection and monitoring. Plans and programs should establish specific measurable benchmarks and targets to increase accountability towards quantifiable environmental change that will support health.

¹ Recommendations based on draft Healthy Places Principles formulated by the Healthy Places Coalition.

- Applicants should be encouraged to submit plans and programs that create access to high quality, health-promoting infrastructure. This would include: parks, recreational facilities, joint use facilities, and natural spaces, and, infrastructure for active multi-modal transportation including walking and bicycling. “Access” to these resources should be defined as proximity, appropriateness, and affordability.

3. **Allow grant funds to be used for to improve and maintain existing facilities that are opened for broader community use through joint use agreements.** The “joint use” of facilities enables existing infrastructure to serve the broader community. An example of a joint use project would be a school garden that is made available to the surrounding neighborhood for use as a community garden or a school site that is opened to the broader community after hours for recreational or civic activities. In many communities, the local school is the only safe facility with playground equipment, meeting space, etc., but it is closed once school is dismissed. Rather than invest in purchasing and developing new infrastructure, joint use programs efficiently and effectively uses existing infrastructure that is centrally located in a neighborhood. Currently, no other funding is available for maintaining or improving existing infrastructure that is opened to the community. This has been identified as a key problem in expanding joint use programs.

Improving public health will be a critically important accomplishment of AB 32 and SB 375 efforts, because meeting California’s greenhouse gas reduction targets will require more walking and cycling and less motor vehicles use. This will result in substantial health benefits, including reduced incidences of cardiovascular disease, breast cancer, diabetes, and depression. Creation of urban environments that enable more access to green spaces, opportunities for physical activity, and compact development will provide significant health co-benefits.

Thank you again for including public health considerations in the application guidelines. We appreciate you consideration of our suggestions and for the opportunity to participate in this important process.

Sincerely,

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